

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LIBERTY RESOURCES, INC., et al.,  
Plaintiffs,

V.

CITY OF PHILADELPHIA,  
Defendant.

Case No. 2:19-cv-03846 HB

Honorable Harvey Bartle III

**PLAINTIFFS LIBERTY RESOURCES INC., ET AL. AND DEFENDANT CITY OF  
PHILADELPHIA'S JOINT SETTLEMENT STATUS REPORT**

The Parties jointly submit the following settlement status report regarding the Parties ongoing negotiations for the settlement of this matter. On January 20, 2022, this Court granted the Parties' Joint Motion to stay trial to permit the Parties to focus on settlement negotiations. The Parties have since continued settlement talks regarding remaining settlement terms and have now exchanged drafts of a final settlement agreement in this matter. Counsel for the Parties most recently met via teleconference this past Friday, February 25, 2022, to confer regarding the exchanged drafts.

While the Parties continue to make progress, additional negotiations and information are necessary to reach final agreement. The Parties continue to engage in good-faith negotiations over a fixed set of remaining terms and the City is currently preparing a revised draft agreement to provide to Plaintiffs. The Parties respectfully request the opportunity to submit an additional joint settlement status report no later than March 31, 2022 to permit the time necessary for additional negotiation. The Parties expect to be able to inform the Court at that time as to whether final agreement can be reached or

whether the Parties will need to move forward with trial. The Parties are available at the Court's convenience should the Court wish to schedule a teleconference to discuss this settlement status report.

Respectfully submitted,

Dated: February 28, 2022

BY: /s/ David Ferleger

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BY: /s/ Sean McGrath

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 28, 2022, the foregoing Joint Settlement Status Report has been filed electronically and is available for viewing and downloading from the ECF system; and has been served on all counsel of record via the Court's ECF electronic notification.

Dated: February 28, 2022

By: s/ Sean McGrath

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